

EXHIBIT B

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW HAMPSHIRE**

RICHARD DASCHBACH and ELCINDA PERSON, individually and on behalf of all others similarly situated,

Plaintiffs,

v.

PMC HOME & AUTO INSURANCE AGENCY, LLC d/b/a PROTECT MY CAR a Florida limited liability company,

Defendant.

Case No. 1:20-cv-00706-JL

DECLARATION OF ELCINDA PERSON

I, Elcinda Person, declare the following under penalty of perjury:

1. I am an adult over 18 years of age.
2. I have personal knowledge of the facts set forth herein. I could and would testify to them if called upon to do so.
3. I am one of the named plaintiffs in the above-captioned matter.
4. I understand that the defendant claims that I visited a website at the address www.retailproductzone.com. I have never visited this website, nor have I ever authorized another person to visit it on my behalf.
5. I likewise never provide any personal information or consent to Defendant prior to this action, and I never provided such information or consent to www.retailproductzone.com.
6. Not only did I not visit this website, I rarely use the internet whatsoever.
7. I only own one internet connective device (my phone) and never use my phone to access the internet.

Respectfully submitted,

Dated: 09-29-2020

Elcinda Person

